

Abdul Hassan Law Group, PLLC
215-28 Hillside Avenue
Queens Village, New York, 11427

~~~~~

**Abdul K. Hassan, Esq.**  
Email: [abdul@abdulhassan.com](mailto:abdul@abdulhassan.com)  
***Employment and Labor Lawyer***

Tel: 718-740-1000  
Fax: 718-740-2000  
Web: [www.abdulhassan.com](http://www.abdulhassan.com)

**January 3, 2022**

**Via ECF**

Hon. Steven I. Locke, USMJ  
United States District Court, EDNY  
100 Federal Plaza, Courtroom 1020  
Central Islip, New York 11722

**Re: Batten v. Northshore Motor Leasing LLC et. al.**  
**Case #: 21-CV-02558 (DRH)(SIL)**  
**Motion for Extension of Time to Complete Mediation**

Dear Magistrate-Judge Locke:

My firm represents plaintiff in the above-referenced action, and I respectfully write to request a 60-day adjournment of the January 5, 2022 initial conference in this matter so that the parties can complete mediation. Since the last request for an extension of time (ECF No. 12), which was due to medical reasons on the defense side, we have not heard from defense counsel and the additional time is needed to reschedule and complete the mediation. A corresponding 60-day extension of the December 24, 2021 deadline for the parties to complete mediation is also requested. We will reach out once again to defense counsel and press to expedite the scheduling of the mediation and keep the Court updated. One prior request for an extension of these deadlines were made and granted.

We thank the Court in advance for its time and consideration.

Respectfully Submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiff*

**Cc: Defense Counsel via ECF**